

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
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2004 SEP 24 A 9:15

U.S. DISTRICT COURT  
DISTRICT OF MASS.

BRANDON ASSOCIATES, LLC )  
Plaintiff )  
v. ) CIVIL ACTION  
FAILSAFE AIR SAFETY SYSTEMS )  
CORP., BLUE SAGE CONSULTING, )  
INC., EICON MEDICAL, )  
DEBRA ESPE, ALAN FEUERSTEIN )  
Defendants )  
NO. 04 12013NMG

MOTION TO AMEND THE VERIFIED COMPLAINT AND ACTION TO REACH AND  
APPLY

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, the Plaintiff Brandon Associates, LLC hereby moves to amend its Verified Complaint and Action to Reach and Apply. The original complaint was filed in Massachusetts Superior Court on September 8, 2004.

Respectfully Submitted,

Brandon Associates, LLC  
By its Attorney,



Stacy J. Silveira, Esq.  
BBO No. 650675  
General Counsel  
Brandon Associates, LLC  
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Dated: September 23, 2004